

Certification Redesign – Topics, Summary Feedback, and Recommendations

The chart below identifies the many topics that were raised both in support of and opposition to the proposed regulations for certification redesign through the public comment process. The public comment process included three public hearings and additional written comments that were collected between September 1, 2011 and October 11, 2011. Thirty-four speakers provided public comment at the three public hearings. RIDE has received 116 additional submissions of written comment. The speakers and written commentary represent more than twenty organizations ranging from the National Center for Teacher Quality, the National Education Association Rhode Island, Rhode Island College, the Rhode Island Middle Level Educators, the University of Rhode Island, and Young Voices among others.

The chart details the topics that were raised, a summary of feedback that was provided on these topics, and recommendations that RIDE has made, including a brief justification for the recommendations for each topic. The chart is divided into three sections – frequently raised topics, topics that were raised in a few instances, and other topics that were raised but do not impact the proposed certification regulations. Most of the points raised during public comment were similar to what RIDE heard from stakeholders during the engagement and development phase. RIDE has considered seriously all of these views along with research and other state practices in determining our recommendations.

Several of the topics, including linking certification and evaluation, embedding professional development in the evaluation system, and revising middle school and secondary special education certification received considerable opposition during the public comment period. Other topics such as the appropriateness of Alternate Route Programs, maintaining the current grade level configuration, and revising the building level administrator certification received more balanced support and opposition. Some topics such as establishing a tiered certification structure, creating a mathematics specialist certification, and ending transcript analysis received considerable support. The summary feedback that is provided in the chart is intended to be representative of the major issues raised during the public comment period and is not indicative of the volume of support or opposition to a particular topic. In some cases, testimony provided represents inaccurate information. This summary is designed to provide you with information about what was submitted and does not correct all inaccuracies.

Frequently Raised Topics

Topic	Feedback	Recommendation and Justification
Alternate Route Programs	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> • Alternate Route Programs prepare candidates to serve in hard to staff areas including math, science, and special education. • Alternate Route Programs are dedicated to recruiting and placing candidates in hard to staff schools, particularly low-performing schools. • Alternate Route Program completers are trained in best-practices through an intense learning experience prior to their placements in Rhode Island classrooms and receive extensive support during their teacher of record placement. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • Alternate Route Programs that provide five weeks of training in the summer do not provide sufficient opportunities for prospective teachers to develop the skills to teach students effectively. • Alternate Route Programs are not aligned to national competencies and do not meet the expectations of national accrediting agencies or specialized professional associations. • Alternate Route Programs are not adequate to prepare teachers to serve students with special needs or English Language Learners as teachers for these students require specialized skills and training that require more than five weeks. • 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>Alternate Route Programs have been established in Rhode Island since 2004. The current regulations were passed in 2008. The proposed regulations make no changes to the previously approved Alternate Route regulations. There is significant research that demonstrates more variation in educator performance within program types (alternate route and traditional), not across program types.</p> <p>Since 2008, two Alternate Route Programs have been reviewed and approved by a rigorous Rhode Island Program Approval process that includes Rhode Island practitioners and out of state higher education faculty and state department officials. Both programs were found to be performing as well as or better than current traditional programs in RI. They are held to the same standards and review process.</p> <p>The Alternate Route Programs have worked to establish mutual partnerships with schools and districts in Rhode Island and RIDE has received extensive feedback that these partnerships are improving PK-12 education in our state including increasing the supply of effective teachers, sharing best practices, and working to establish networks with schools and districts.</p>

<p>Revising Middle Grades Certification</p>	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> • Providing three options for middle grades certification provides districts needed flexibility to assign educators based on the needs of the students as well as changing demographic patterns in the district. • Maintaining a middle grades certificate that is based on the national competencies preserves middle school certification and practices for those schools and districts that chose to organize themselves as middle schools while allowing other districts to assign educators based on the grades they are eligible to teach. • Middle grades certification options 2 and 3 in the proposed regulations allow educators who attain middle grades certification to add two additional years to their elementary or secondary certificate thus allowing them to teach grades 1-8 or 5-12 which increases flexibility for the district. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • Middle grades students and middle school practices are based on the developmental needs of students at these grade levels and only educators who are trained to teach middle grades students should be allowed to teach these students, not elementary or secondary trained educators. • If districts are not required to maintain middle school structures and middle school certified individuals, then districts would likely abandon middle school practices such as teaming and integrated teaching due to budget constraints. • Middle grades certification has been in the certification regulations since 1999 and has served students and educators well by respecting the needs of students. Rhode Island should not go backwards based on the needs of adults. 	<p><u>Options:</u></p> <p>A. Proceed as recommended in the proposed regulations. B. Maintain the current middle school requirements that individuals must hold the certification to teach at that level.</p> <p><u>Recommendation:</u> Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u> The revised middle grades certification is an effort to respond to both those who wish to maintain the current middle school certification and those that wish for greater flexibility to assign teachers based on district needs. The proposed regulations maintain middle grades certification while allowing districts flexibility to assign based on the grade level certification of their teachers.</p> <p>Many educators and districts are often confused as to where an educator can or cannot teach depending on whether the school is classified an elementary school, middle school, or junior high school. Allowing an educator to teach in any school and grade level for which they are certified will streamline the certification process and clarify expectations for the field.</p> <p>There remains an incentive for an educator to pursue middle grades certification as proposed in the regulations as they would be able to earn a stand-alone middle grades certificate or add a middle grades certificate to an elementary or secondary certification thus allowing them to teach two additional grade levels beyond their original certification.</p> <p>Many middle school practices such as personalization and integrated studies are common practices in elementary, middle, and high schools and will continue to be considered best practices even with a revision of the middle school certification.</p>
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<p>Linking Certification and Evaluation</p>	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> • Teacher effectiveness is critical to ensure that all students are able to meet state and national standards; connecting certification and evaluation will ensure that an ineffective educator does not limit students' opportunity to grow and learn. • The connection between certification and evaluation will help establish a strong performance management system that is based on specific feedback on teaching practice, a clear path for ongoing professional development, and career advancement based on an individual's success in the classroom. • The proposed regulations would only impact a teacher if that teacher was Ineffective for five consecutive years. A teacher who is Ineffective for five consecutive years should not be allowed to teach in Rhode Island schools. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • The evaluation system that will provide ratings to inform certification renewal is too new. Parts of the evaluation system have not yet been developed and it is not fair or appropriate to make renewal decisions based on an untried system. The use of student tests as part of evaluation is not a proven process that will show how teachers impact their students' learning. • I believe that we would agree that the essence to good teaching is taking our students from where they are and providing them with a happy, high quality learning environment that is based on trust and strong rapport. We need to do the same for our teachers by not turning the evaluation process into a "gotcha system" based on fear, unsettledness, and anxiety. • Certification is the process which the state uses to affirm that an educator has met basic requirements to teach. Evaluation is an employer's responsibility to identify how well a teacher is doing and how they should improve. The two processes are different and it would be wrong to connect them. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The evaluation system was designed to support the professional growth of all educators by providing an annual effectiveness rating as well as a professional growth plan specifically designed to help strengthen practice. By linking certification and evaluation, RIDE will make certification decisions based on the long-term performance of educators.</p> <p>The evaluation system was specifically designed to ensure that evaluation ratings will be based on multiple measures including professional practice, professional responsibilities, and impact on student growth and academic achievement. Additionally, there are procedural safeguards in the system to ensure that all educators are evaluated fairly and accurately including extensive training for evaluators and evaluatees, multiple conferences and check-ins, as well as a local appeals process.</p> <p>Under the proposed regulations, RIDE will not make any certification decisions based on evaluation ratings until 2015 for new teachers and 2017 for veteran teachers. RIDE has already committed to studying the results of evaluation on an annual basis. If RIDE determines that the evaluation ratings across the state are not valid or reliable, the Regents will have multiple opportunities to direct RIDE to sever the link between certification and evaluation.</p> <p>If an educator's certificate is not renewed due to performance concerns, RIDE will provide a reinstatement process that would allow the educator to seek re-training and reinstate their certification.</p>
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<p>Embedding Professional Development in the Evaluation System</p>	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> • The evaluation system that includes professional development is a more meaningful way to ensure that educators have supportive professional development that is based on outcomes of student learning and not inputs of arbitrary credit requirements. • Research shows that the requirement for ongoing professional development and coursework do not positively impact student learning. • Requiring educators to take course work to renew or progress between certifications is a disincentive for teachers to stay in the profession for those who want to teach but who do want to or cannot afford to continue taking courses and earning degrees. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • Educators must continue to improve their practice; beginning preparation is not sufficient to ensure all educators know and use best practices. Ongoing professional development, course work, and degrees are what educators need to advance their skills. • Principals who will develop professional growth plans with educators as part of the evaluation system do not always know or have access to the most current information or have expertise in all fields, therefore relying on professional growth plans will not ensure that educators receive the training that they need. • Educators are professionals and like other professional fields they should continue to enroll in course work and earn advanced degrees to improve their skills and develop their capacity. There is no substitute for ongoing learning that is part of cohesive programs of study that lead to advanced degrees. 	<p><u>Options:</u></p> <ul style="list-style-type: none"> A. Proceed as recommended in the proposed regulations. B. Require educators to submit an attestation that assures the completion of professional development that was part of the evaluation process to renew or progress between certifications. C. Require educators who receive an Ineffective rating as part of the evaluation system to complete specified professional development as a requirement to renew or progress between certifications. <p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>We know from clear research that the most effective professional development, which which changes practice, is job embedded and designed to address specific needs. Unless educators have opportunities to implement what is learned and receive feedback on implementation, professional development and courses often do too little to improve an embedded instructional practice. The Evaluation Standards prioritize ongoing professional development as an essential aspect of professional growth and educator improvement. All educators must identify professional growth goals annually and develop an improvement plan that specifies professional development that they will engage in to meet these goals. These plans are developed using the specific feedback provided during the evaluation process as well as significant priority areas for the district. Local districts and principals are better positioned to identify what type of professional development an educator needs to improve rather than RIDE arbitrarily stating that all educators must complete a number of credits over some period of time.</p>
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<p>Requiring Content Expertise for Secondary Special Education Certification</p>	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> • Special educators at the secondary level should have training to work with students at this developmental level. • Special Educators at the secondary level should have content expertise consistent with other secondary level teachers. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • Special education students at the secondary level have multiple needs and not all secondary students with special needs are best served by secondary certified teachers. Elementary trained special education teachers are effective supports for some students with special needs in the secondary grades. • Requiring a secondary content area to become a secondary special educator may exacerbate a shortage area for teachers as many schools have difficulties finding secondary special educators. • Elementary education should be allowed as one of the content areas that an educator can use to earn secondary special education certification. 	<p><u>Recommendation:</u> Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u> RIDE received strong recommendations from the special education community that there were equity concerns with the number of special educators at the secondary level who do not have training as secondary teachers – approximately 60%. The proposed regulations were developed to address this gap and ensure that secondary students with special needs are supported by educators who are prepared to meet their developmental and learning needs. RIDE considered federal law, local survey data and input from informational sessions in developing these regulations.</p> <p>The proposed regulations will not take effect until 2015 which would allow preparation programs time to make necessary adjustments to ensure that they can admit and prepare candidates who meet the expectations of the proposed regulations.</p> <p>RIDE would not require currently certified secondary special educators to meet the proposed regulations. They would be allowed to continue their certifications and current job assignments.</p>

<p>Grade Level Configuration (PK-2, 1-6, 5-8, 7-12)</p>	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> • The proposed grade level configuration allows districts flexibility to hire and assign educators for a variety of roles, which is important as districts periodically revise their school grades. • The proposed grade level configuration maintains the PK-2 certification for Early Childhood Education, which ensures that educators who work with very young children will be trained and certified to work with this developmental level student. • The proposed grade level configuration maintains a separate middle school certification that provides opportunities for districts and individuals who prioritize middle level education to organize their schools as middle school and only hire individuals with a middle school certification. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • The proposed grade level configuration confuses schools, districts, and educators as to which grade level and which school structure an individual is allowed to teach in. • The proposed grade level configuration should not contain any overlap. An individual should only be allowed to teach at specified grade levels for which they have been trained and districts must assume responsibility for hiring and assigning educators who are appropriately certified for an assignment. • The proposed grade level configuration limits flexibility and causes hardships for schools and districts when they have educators that can only teach grades 1-6 when they work in an elementary school that has students in grades K-6. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The proposed grade level configuration is the same grade level configuration that is currently in place in Rhode Island.</p> <p>The overlap in grades 1-2, 5-6, and 7-8 is consistent with national practices and provides needed flexibility to districts as they are periodically required to change staffing patterns due to budget and enrollment issues.</p> <p>The proposed grade level configuration maintains certifications for early childhood and middle grades as separate certifications based on the developmental needs of students.</p>
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English as a Second Language Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The proposed regulations base the requirements for ESL certification on the national TESOL Standards which would ensure that educators who earn this certification would be appropriately trained to meet the needs of English Language Learners. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> The proposed regulations do not require or provide incentives for individuals to earn ESL certification. In the absence of certification regulations that require individuals to earn credits and degrees, educators would be less likely to pursue training in ESL education. Since Rhode Island is becoming an increasingly diverse state, all educators should be required as part of earning certification in Rhode Island to take course work in ESL education. 	<p><u>Recommendation:</u> Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u> The proposed ESL certification is based on national standards consistent with all other certification areas that are contained in the proposed regulations.</p> <p>ESL teachers must be certified to be ESL teachers. They can complete the certification process through traditional programs or alternate route programs if one is developed.</p> <p>The proposed certification regulations are based on professional development being an embedded and integral part of the evaluation system. Any educator that needs training and professional development to work with English Language Learners would receive that training as part of their professional growth plans. Additionally, all teacher preparation programs must provide basic training and practice working with ELL students. Programs are reviewed for this component as part of their approval.</p> <p>RIDE will work with all Rhode Island preparation programs to address any needed changes in program design and curriculum that may be necessitated by the adoption of new certification regulations, including training in ESL education.</p>
Tiered Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The tiered certification structure that is established in the proposed regulations will support educator growth and career advancement. The Advanced Certification provides recognition for excellence in education when too often we focus on those who do not excel. The Advanced Certification will encourage educators to pursue growth and leadership opportunities thus increasing the capacity of the educational system. 	<p><u>Recommendation:</u> Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u> Unlike many other states, Rhode Island currently has a single tier certification system. Educators begin as professional educators. There is no distinction between beginning educators, veteran educators, and excellent educators. A tiered certification would be consistent with the practices of other states and support career advancement and professional growth.</p>

	<p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • Rhode Island considered a tiered diploma system for students and rejected this path. RIDE should not consider a tiered certification system for teachers. 	<p>Educators would have to demonstrate effective practice as a means to progress between the proposed certification tiers thus prioritizing effective practice as a means to advancement.</p> <p>Educators who attain an Advanced certification would receive a longer certification period (seven years instead of five years for a professional certification) and would need to continue to demonstrate effective practice to maintain the Advanced certification.</p>
Transcript Analysis	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> • Certification requirements should be based on national competencies and standards, not lists of courses that may not be current or based on the needs of schools and districts. • The Transcript Analysis process does not support educators to complete cohesive preparation programs that ensure educators have supervised field experiences that allow individuals to develop their practice with guidance and support of established programs. • Preparation programs look forward to working with RIDE to revise and establish programs that are based on the national competencies and standards. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> • None 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>RIDE has considered ending the Transcript Analysis process for several years over concerns of the sufficiency and coherence of counting individual courses as a means to certification.</p> <p>RIDE will maintain a modified Credential Review process for individuals seeking certification for which there are no approved preparation programs in Rhode Island.</p> <p>RIDE will work with preparation programs to develop a process for approved programs to conduct a Credential Review process. This process will be available for individuals who seek admission to an approved program but who request consideration of previous coursework and/or experiences as credit toward program completion. A goal of this process will be to ensure that all individuals who have previous coursework/experiences are not always required to 'start again.'</p>

Topics That Were Raised in a Few Instances

Topic	Feedback	Recommendation and Justification
Combined PK-12 Building Level Administrator Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The state and national standards that are the basis of the proposed PK-12 Building Level Administrator Certification address the full range of leadership expectations and should lead to administrators who are well-prepared to work at any grade level school. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> Building administrators should have experience at the grade level they will serve, particularly at the middle level. As such, RIDE should certify administrators consistent with the grade level configuration of the general education certifications. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The preparation programs for Elementary/Middle and Middle/Secondary Principal certifications currently offered in Rhode Island are already designed to prepare individuals for a PK-12 context. Variation occurs at the internship point and is conducted at the grade level at which an educator has had educational experience.</p> <p>A combined PK-12 building level administrator certification is common practice in many other states.</p> <p>Through the hiring process, districts can select those individuals they feel best match the needs of a school rather than this determination being made through the certification process. This may mean that an elementary school would only hire an individual with an elementary background.</p>
Math Specialist Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> There is a national effort to train and certify mathematics specialists as necessary support for students and teachers to make necessary gains in mathematics. The addition of a Mathematics Specialist Certification in Rhode Island would help to advance mathematics education in our state. The proposed Mathematics Specialist Certification is based on national standards that appropriately identify the required training and skills needed to earn this certification. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>There is a clear need to improve the mathematical skills of students in Rhode Island. Rhode Island students have made consistent gains in literacy and Reading Specialists have been part of the solution to address literacy needs in our state. A Mathematics Specialist would act in a similar manner as a Reading Specialist – provide targeted instruction to struggling students and/or help educators improve their mathematics instruction.</p>

	<ul style="list-style-type: none"> Preparation programs in Rhode Island support the addition of this certification area and are ready to work with RIDE to develop a program to lead to earning the Mathematics Specialist Certification. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> There is a need to clarify what type of internship would be needed to attain this certification to ensure that working teachers can complete approved programs in this area. While a Mathematics Specialist Certification is a valuable addition to Rhode Island, the certification should be for grades PK-12 as is the Reading Specialist Certification. 	<p>After significant consultation, RIDE is recommending a PK-8 certification and not a PK-12 certification as the national standards for the certification are for grades PK-8 and making the certification a PK-12 certification may discourage educators at the elementary level, the initial focus area for this certification, from pursuing the Mathematics Specialist Certification.</p>
Special Education Administrator Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The proposed Special Education Administrator Certification appropriately recognizes the role of the Special Education Administrator as being a valuable part of a district leadership team. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> Many current Special Education Administrators do not have an administrator background; requiring current Special Education Administrators to meet the new requirements may create a shortage of certified Special Education Administrators. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The proposed Special Education Administrator Certification is aligned to the other proposed district administrator certificates. All of the proposed district administrator certifications are based on state and national standards to ensure appropriate preparation, knowledge and skills for district leaders.</p> <p>The proposed regulations would allow currently certified Special Education Administrators to maintain their certifications; the proposed regulations would pertain to newly certified individuals.</p>
School Business Administrator Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> School Business Administrators perform an essential role in the education of students ensuring that districts act as responsible fiscal agents of education funds. The inclusion of a School Business Administrator Certification in the proposed regulations demonstrates RIDE's recognition of the importance of School Business Administrators. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The School Business Administrator Certification is currently offered by RIDE. Continuing this certification will help support districts to meet their fiscal responsibilities.</p>

	<p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> RIDE should ensure that every LEA has a certified School Business Manager on staff to meet the LEA's fiscal responsibilities. RIDE should also require ongoing professional development based on the needs of School Business Administrators and the changing realities of school finance. 	<p>RIDE will work with LEAs to ensure the certification, reporting, and renewal process for School Business Administrators.</p>
School Nurse Teacher Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> School Nurse Teachers are important support for schools, teachers, students, and families and should continue to be certified by RIDE. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> School Nurse Teachers should not have to complete student teaching as they are working professionals and are not able to take a semester off from work to complete student teaching. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>School Nurse Teachers are currently certified by RIDE and required to complete student teaching to earn full, professional certification. RIDE currently allows School Nurse Teachers to attain a One Year Professional School Nurse Teacher Certification through which they can meet the student teaching requirement.</p> <p>The proposed Expert Preliminary Certification would serve as the vehicle through which an individual could serve as a School Nurse Teacher while meeting the full requirements of the Initial Educator Certification.</p>
Special Education – Severe Intellectual Disability Teacher Certification	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The proposed certification for teachers who serve students with severe disabilities is necessary for students who have profound disabilities and require additional supports and learning opportunities. Special Education teachers who serve students with severe disabilities should be required to hold a general education certification. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> The proposed regulations allow a special educator who teaches students with severe disabilities to hold 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The proposed regulations increase the general education requirements for teachers of students with severe disabilities. Current regulations do not require a teacher to hold any general education certification.</p> <p>Requiring multiple grade level certifications (e.g. elementary, middle, and secondary) would likely lead to shortages as there are limited numbers of certified special</p>

	<p>any general education certification. This is not consistent with the recommendations for the other special education certifications. Certifications for teachers of students with severe disabilities should be aligned to the appropriate general education certification as is expected for all other special education certifications.</p>	<p>educators who meet the certification requirements for this area. Additionally, districts typically do not have many students with these identified needs, thus a common approach is to create a multi-grade class staffed by an educator with an all-grades certification as is recommended in the proposed regulations.</p>
<p>Adapted Physical Education Certification</p>	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The continuing requirement by RIDE that individuals who teach physical education to students with special needs should hold the Adapted Physical Education Certification is appropriate and meets the needs of students with special needs. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> The proposed forty-five hour practicum is not sufficient for prospective teachers to meet the expectations of the national competencies. The practicum should be increased to seventy-five hours. The proposed use of the National Association for Sport and Physical Education (NASPE) standards should be replaced with the Adapted Physical Education National Standards (APENS) which more closely are aligned to the certification. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations while increasing the required practicum from forty-five to seventy-five hours. .</p> <p><u>Justification:</u></p> <p>Members of the Adapted Physical Education field in Rhode Island have recommended that additional practical experience in the field is necessary for prospective teachers to meet the expectations for their certification area. Both Rhode Island College and the University of Rhode Island, which prepare candidates for this certification, are in agreement with the increased practicum experience.</p> <p>The proposed regulations have aligned certification requirements to those requirements based in national standards as identified by the National Council for Accreditation of Teacher Education (NCATE). NCATE as the largest accrediting body for educator preparation has identified the NASPE standards as the standards that are used to establish and review preparation programs for the preparation of physical education teachers who serve students with special needs.</p>

Certification and Evaluation of Educators in Non-Public Special Education Schools	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The establishment of the tiered certification system will allow Special Educators who teach in non-public special education settings to get Initial Professional Certifications instead of the current system in which these educators can only receive a Certificate for Eligibility for Employment (CEE). <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> Non-public Special Education Schools have a specific mission and purpose to serve students in the areas of academics as well as social, emotional and family needs. Requiring teachers in these schools to participate in a standards, RIDE approved evaluation system is not appropriate. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>Federal and state regulations for the education of students with special needs require that these students are taught by teachers who meet full state certification requirements. RIDE's current certification system only allows these educators in non-public schools to attain a CEE, not a full professional certification, and doesn't impose any renewal requirements. The establishment of the three-tiered certification system would allow these educators to attain a full, professional Initial Educator Certification and would ensure that all teachers of students with disabilities are held to the same renewal standard.</p> <p>The Evaluation Standards state that all educators certified by RIDE must be evaluated by a state-approved, local evaluation system. RIDE will work with the schools and their educators to integrate these schools and teachers into the evaluation system.</p>
Support Professional Certifications	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The new Support Professional Certifications established in the proposed regulations, including Mathematics Specialist, Instructional Leader, and ESL Specialist, as well as the current Reading Specialist Certification, are appropriate certifications that RIDE should offer to support schools, teachers, and students to promote student growth. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> RIDE should ensure the effectiveness, reach, and demand for the new and existing Support Professional Certifications by requiring that districts only assign individuals in these roles if they have the full state certification. Without this requirement, it is not clear that there will be a demand for preparation programs in these areas. 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The inclusion of several new Support Professional Certifications in the proposed regulations provides opportunities for individuals to increase their capacity to serve in support roles in schools and districts. The Reading Specialist Certification has had a positive impact on student growth and the additional Support Professional Certifications were created to meet similar needs.</p> <p>The proposed regulations do not require individuals to hold these certifications to allow districts flexibility to assign the most effective educators to support positions based on the needs of the school and student.</p>

Certification Fees	<p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> The proposed regulations base certification renewal on ratings from state approved, local evaluation systems. Since districts must conduct the evaluation process, some portion of the fees for certification should be returned to the districts. The proposed fee structure for Alternate Route Certification requires individuals who seek more than one Alternate Route Certification to pay \$100 per certificate. This amount may be exorbitant for a new educator who is working to complete their preparation program. The fee for Alternate Route Certifications should be lowered to \$50 per certificate. 	<p><u>Options:</u></p> <ul style="list-style-type: none"> A. Proceed as recommended in the proposed regulations. B. Reduce the fee for the alternate route certificate to \$50. <p><u>Recommendation:</u> Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u> The certification fee structure that is contained in the proposed regulations is the same as the current fee structure. Under the proposed regulations, RIDE will continue to accept applications and issue certifications. All revenue that is generated from the certification process is deposited in the Rhode Island general fund.</p>
Library Media Standards	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> None <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> It is not clear that the standards for School Librarians included in the proposed regulations are appropriate for the preparation of School Librarians. 	<p><u>Recommendation:</u> Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u> The American Library Association/American Association of School Librarians are the standards recognized by the National Council for Accreditation of Teacher Education (NCATE). RIDE has used the standards that are identified by NCATE as the nationally recognized and accepted standards for the preparation of educators.</p>
World Language Certification (PK-12)	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> World languages should be taught at the elementary grades when students are most ready to learn and develop competency in a new language. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> The proposed recommendation to expand the current World Language Certification from secondary grades (7-12) to all grades (PK-12) is not appropriate at this time. There are no preparation programs to support 	<p><u>Recommendation:</u> Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u> There is support in Rhode Island to increase world language offerings at the elementary and middle grade levels. Currently RIDE only offers a secondary certification for world language for which an individual can add an endorsement for the middle grades. Expanding the certification to all grades (PK-12) will increase</p>

	<p>this move and there are not sufficient field settings in elementary schools for prospective candidates to prepare to serve these grade levels.</p>	<p>opportunities for students at the elementary level to be exposed to world languages when they are most ready to learn new languages.</p> <p>RIDE will work with preparation programs to adjust the curriculum and field experiences that will be required to prepare educators to serve students in grades PK-12. Where necessary allowances will be given to encourage expansion in this area. RIDE reviewed the practices of other states in developing this recommendation.</p>
<p>Expert Resident and Visiting Lecturer Preliminary Certification</p>	<p><u>In Support of:</u></p> <ul style="list-style-type: none"> The Visiting Lecturer and Expert Resident Preliminary Certificate are appropriate options for experts in various fields to share their experiences and skills with students in PK-12 schools. <p><u>In Opposition to:</u></p> <ul style="list-style-type: none"> None 	<p><u>Recommendation:</u></p> <p>Proceed as recommended in the proposed regulations.</p> <p><u>Justification:</u></p> <p>The Expert Resident and Visiting Lecturer Preliminary Certificate were included in the proposed regulations as a way to increase opportunities for highly skilled and knowledgeable individuals to help meet the needs of students and school.</p> <p>Individuals who wish to seek the Expert Residency Preliminary Certificate must first demonstrate their content knowledge and then will be issued a preliminary certificate that they can use while they complete any outstanding certification requirements.</p> <p>Individuals who seek the Visiting Lecturer Certificate must first demonstrate their content knowledge and expertise and then will be issued a preliminary certificate that does not lead to full certification.</p>

Other Topics

Topic	Comments/Recommendation
Student Teaching and Field Experiences	<p><u>Comments:</u> A few questions were raised regarding student teaching and field experiences required to earn various certifications and the appropriate field experiences required for individuals who seek to earn more than one certification at one time.</p> <p><u>Recommendation:</u> The Rhode Island Program Approval process works with preparation programs to establish requirements for field experiences and should continue to be the vehicle to address these issues.</p>
Awarding an Alternate Route Certificate after the Completion of Coursework, not the Completion of the Program	<p><u>Comments:</u> A few questions were raised regarding when individuals in Alternate Route programs receive their certificates and asking that RIDE issue certificates after the completion of course work and prior to the completion of the approved program to support candidates as they seek to enter the job market.</p> <p><u>Recommendation:</u> Completion of an approved program is a requirement for certification for individuals in Alternate Route Programs. An individual is not considered to have completed the program until all requirements have been successfully completed which is the same expectation of all programs. As such, individuals should not receive certifications until they complete all program requirements. While completing the alternate route program, individuals are issued an alternate route certificate. Following completion they will be issued an initial certificate.</p>
Reciprocity for Alternate Route Certifications	<p><u>Comments:</u> A request was made for RIDE to accept Alternate Route Certifications as a path to Rhode Island certification based on reciprocity requirements.</p> <p><u>Recommendation:</u> RIDE accepts certifications from other states when the certificate meets the definition of full certification. This is a common practice among states. If a state issues an Alternate Route Certification that meets this level, RIDE does and will continue to accept such certification as a path to Rhode Island certification under the proposed regulations. RIDE also accepts out of state approved programs as part of reciprocity. If an alternate route program has been approved by the sending state, RIDE would accept it as an approved program.</p>